

Region One 490 N. Meridian Road Kalispell, MT 59901 (406) 752-5501 FAX: (406) 257-0349 Ref:DV182-01 July 30, 2001 Montana Fish, Wildlife & Parks

TO: Environmental Quality Council, Capitol Building, Helena, 59620-1704

Dept. of Environmental Quality, Planning, Prevention & Assistance, PO Box 200901, Helena, 59620-0901

Dept. of Environmental Quality, Permitting Compliance, PO Box 200901, Helena, 59620-0901

Montana Fish, Wildlife & Parks: Director's Office – Rich Clough; Fisheries Division – Karen Zackheim; Legal Unit MT Historical Society, State Historic Preservation Office, 225 North Roberts, Veteran's Memorial Building, Helena, 59620-1201

Montana State Library, 1515 East Sixth Ave., Helena, 59620-1800

Jim Jensen, Montana Environmental Information Center, PO Box 1184, Helena, 59624

George Ochenski, PO Box 689, Helena, 59624

Wayne Hirst, Montana State Parks Foundation, PO Box 728, Libby, 59923

Montana State Parks Association, PO Box 699, Billings, 59103

Joe Gutkoski, President, Montana River Action Network, 304 N 18th Ave., Bozeman, 59715

Rep. Paul Sliter, PO Box 118, Somers, 59932

Rep. Darrel Adams, 155 Eastland Crossroad, Columbia Falls, 59912-9300

Sen. Jerry O'Neil, PO Box 2058, Kalispell, 59903-2058

Sen Bob Keenan, Box 697, Bigfork, 59911-0697

Flathead County Commissioners, 800 S Main, Kalispell, 59901

Flathead County Library, 247 First Avenue E, Kalispell, 59901

Stan Frasier, Montana Wildlife Federation, PO Box 1175, Helena, 59624

Janet Ellis, Montana Audubon Council, PO Box 595, Helena, 59624

Arlene Montgomery, Friends of the Wild Swan, PO Box 5103, Swan Lake, 59911

Warren IIIi, Flathead Wildlife, Inc., PO Box 4, Kalispell, 59903

Glen Anacker, Trout Unlimited, PO Box 638, Kalispell, 59903-0638

Bruce Farling, Executive Director, MT Trout Unlimited, Box 7186, Missoula, 59807

Wade Fredenberg, Creston National Fish Hatchery, 780 Creston Hatchery Road, Kalispell, 59901

Jim Mann, The Daily Inter Lake, PO Box 7610, Kalispell, 59904

Bob Raney, 212 S. 6th, Livingston, 59047

Ladies and Gentlemen:

Montana Fish, Wildlife & Parks, Region One, has completed an Environmental Assessment (EA) for the Brown Trout Pond Rehabilitation project. Brown trout have been verified in the Flathead drainage upstream from Kerr Dam in three ponds near the Flathead River (T29N, R21W, S35) in Flathead County. The purpose of the project is to eradicate the illegally introduced population of brown trout from the ponds to minimize potential threats to native species in the Flathead River drainage.

There were no changes to the draft EA; therefore, the draft becomes the final EA. A copy of the Decision Document is enclosed for your information.

Sincerely

niel P. Vincent

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Environmental Assessment and Decision Notice for the Brown Trout Pond Rehabilitation Project

7/23/2001

Project proposal and Justification:

In July 2000, Montana Fish, Wildlife and Parks (MFWP) personnel discovered a reproducing population of nonnative brown trout inhabiting three ponds (gravel pits) near the Flathead River. This is only the second time brown trout have been verified in the Flathead drainage upstream from Kerr Dam; the first population is being removed at this time. Brown trout directly compete with bull trout (ESA listed species) for spawning, rearing, and food and space resources. The purpose of this project is to eradicate the illegally introduced population of brown trout from the ponds using a fish toxicant in order to minimize potential threats to native species in the Flathead River drainage. Failure to immediately eradicate this population may result in brown trout colonizing other areas of the river-lake system, possibly reducing the abundance and distribution of native fishes. This action is consistent with the Governor's Bull Trout Restoration Team recommendation for removal or suppression of introduced fish to aid in bull trout recovery.

Site location and characteristics:

The private ponds are located east of Kalispell, MT at T29N, R21W, S35. The ponds have a surface acreage of 4.3 acres with maximum depths of 15 feet.

Environmental and social impacts:

No adverse effects are expected; only minor impacts and associated mitigative actions were found in the EA process. The following is a summary of minor impacts and mitigation.

The petroleum-based carrier in the toxicant has an odor. Following application, this odor will be detectable in the near vicinity. It will dissipate in a matter of days. There are no inlets or outlets from the ponds. This will eliminate any potential for the rotenone-treated water from being released into other surface waters.

The concentration of rotenone which will be used in this project will not be harmful to plants, most invertebrate populations, adult amphibians, reptiles, birds, or mammals, including humans, from exposure to treated water, drinking of treated water, or ingestion of treated fish.

Substantial research has been conducted to determine the safety of rotenone. From this research it has been concluded that rotenone does not cause birth defects, reproductive dysfunction, gene mutation, or cancer. When used according to label instructions for the control of fish, rotenone poses little, if any, hazard to public health. The USEPA has concluded that the use of rotenone for fish control does not present a risk of unreasonable, adverse effects to humans and the environment.

Rotenone has only a minor potential impact on the water quality for several reasons. The hazard associated with drinking water containing rotenone is very small because of the low concentration of rotenone (0.1 ppm) used in the treatment and the rapid breakdown and dilution of rotenone.

The risk that rotenone will enter and be mobile in groundwater is minimal. Rotenone's ability to move through soil is low to slight. Rotenone moves less than 1 inch in most types of soils, except for sandy soils where the movement is slightly more than 3 inches. Rotenone is strongly bound to organic matter in soil, so it is unlikely that rotenone would enter the groundwater. However, even if groundwater contamination could occur, there would be a low potential for detrimental effects on human health, since the surface water concentrations to be used in this project have already been shown to have no toxic effect on humans or other nongill-breathing animals. Furthermore, any rotenone that enters groundwater will continue to be diluted by water already present in the aquifer.

Effects on other water users: Bioassays on mammals suggest that at the proposed concentrations of rotenone that will be used, it would have no effect on mammals that drink the treated water. There is no reason to restrict the use of rotenone in waters intended for irrigation, livestock consumption (except possibly for swine), and recreational swimming use. The degradation process can vary from 1-8 weeks depending on initial concentrations, temperature, and water chemistry. This is not a concern since the ponds are not used for domestic purposes or livestock. Also, the waters have no direct public access.

Public involvement:

In compliance with the Montana Environmental Policy Act, an environmental assessment was prepared and circulated for public comment from June 18 to July 19, 2001. Notices were advertised in local newspapers, including an article on July 3, 2001, and copies were made available at the Kalispell office of Fish, Wildlife and Parks, local and state libraries, and on the MFWP web site.

During the public comment period we received nine comments. In summary, three came from organized groups or governmental agencies and six came from private individuals. Four were in support of the project, two were opposed, and three were neutral. In support, general comments included the recognition of the threat that brown trout pose to native trout and support of chemical eradication. In opposition, general comments included not killing the brown trout because they are reproducing naturally and providing sport fisheries in other parts of Montana. One person felt that the brown trout should be moved to the Flathead River to provide angling and that we should be protecting the existing species no matter what species. There was also concern that fish would be wasted and fish killed by the project should go to the elderly or the food bank. Two people who commented were concerned that the project would degrade the underground aguifers due to the porous soils in the area.

Decision notice:

Based on the purpose and justification for the project, the environmental assessment, and the public comment received, I recommend that the proposed project be implemented to reduce the current distribution of brown trout in the Flathead Basin.

Danie P. Vincent Region One Supervisor

Montana Fish, Wildlife & Parks